

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT**

I, Kevin G. Mello, being duly sworn, depose and state as follows:

**Introduction and Agent Background**

1. I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant.

2. I am a Special Agent with the Drug Enforcement Administration (“DEA”) and have been so employed since August 2015. I am currently assigned to the New England Field Division where I am a member of the DEA Boston Tactical Diversion Squad.

3. I have participated in numerous investigations and arrests involving violations of state and federal controlled substances laws, including Title 21, United States Code, Sections 841(a)(1) and 846. A number of those investigations resulted in arrests, indictments, and convictions for violations of drug laws and/or other criminal offenses, the seizure of drugs, money, and vehicles, and the forfeiture of personal property. My investigations have included the use of surveillance techniques, tracking warrants, controlled purchases, and the execution of search, seizure, and arrest warrants.

4. As a result of my training and experience, I am familiar with the methods, routines, and practices of individuals involved in the use, sale, and trafficking of narcotics. I am also familiar with the various paraphernalia used to manufacture, compound, process, deliver, and dispense, import and export, and use controlled substances such as methamphetamine, fentanyl, heroin, cocaine, marijuana, prescription medications, and others. I have debriefed numerous defendants, informants, and witnesses who have had personal knowledge about drug activities and the

operation of drug trafficking organizations. I have sworn out numerous affidavits in support of search warrants, arrest warrants, and other Court applications.

5. Based on my training, experience, and consultations with other experienced law enforcement officers, I also know that drug dealers regularly use cellular telephones to conduct their drug-related business. I am familiar with the manner in which drug traffickers use telephones, coded or slang-filled telephone conversations, text messages, and other means to facilitate their illegal activities. Because cellular telephones are often the principal means by which drug dealers communicate with their suppliers and customers, drug traffickers typically keep their cellular telephones with them at all times. As a result, information related to drug trafficking is often stored on drug traffickers' cellular phones.

6. Based on my training and experience, I am aware that drug traffickers commonly use cellular telephones to communicate and further their drug-trafficking activities. I am familiar with the manner in which drug traffickers use coded, veiled, or slang-filled language when discussing their illegal business, in an effort to prevent detection, and that they often use text messages in lieu of phone calls to avoid speaking over the telephone. I am also familiar with the "street" language used by drug traffickers, as well as the methods they use to disguise conversations and operations. I am additionally familiar with the manner in which drug traffickers use electronic text messages in lieu of or in addition to telephone calls. Additionally, I am aware that drug traffickers frequently use encrypted phone applications, including WhatsApp and FaceTime (along with social media applications such as Instagram and SnapChat), in an effort to evade law enforcement scrutiny when communicating about their illegal activity. Furthermore, I am aware that drug traffickers secrete records relating to income from controlled substances and expenditures of money and wealth, as well as documents indicating travel, and evidence of

financial transactions in secure locations within their cell phones, computers, hard or flash drives, residences, businesses, and/or other locations and devices, and use other means to facilitate, disguise, and conceal their illegal activities.

### **PURPOSE OF AFFIDAVIT**

7. I am submitting this affidavit in support of an application for a criminal complaint charging that from a date unknown, but no later than May 11, 2023 until March 7, 2025, Douglas REIS DE SOUZA (“REIS DE SOUZA”), Dekny Marcos DE CARVALHO REIS (“DEKNY”) Dekmara DE CARVALHO REIS (“DEKMARA”), and Wandis Cleia GUIMARAES (“GUIMARAES”) (collectively “Defendants”), and other individuals not charged in this complaint conspired to distribute and possess with the intent to distribute controlled substances, in violation of 21 U.S.C. § 846 (the “Target Offense”).

### **PROBABLE CAUSE**

#### **I. OVERVIEW OF INVESTIGATION**

8. Since October 2023, federal law enforcement officers have conducted a criminal investigation of a Drug Trafficking Organization (“DTO”) operated by REIS DE SOUZA regarding violations of the Target Offense. The REIS DE SOUZA DTO has used shipping companies to illegally import pharmaceutical grade drugs from Brazil into the United States, then uses the United States Postal Service (“USPS”) in the illegal redistribution of said drugs in Massachusetts, among other places. In addition, the REIS DE SOUZA DTO, including the Defendants, have distributed controlled substances to customers in person.

9. On May 11, 2023, pursuant to its border search authority United States Customs and Border Protection (“CBP”) seized a package containing approximately 120 tablets containing alprazolam, a Schedule IV controlled substance; and 360 tablets containing clonazepam, a

Schedule IV controlled substance. Both alprazolam and clonazepam are members of the benzodiazepine class of drugs. The customs declaration listed the sender of this package as Fernando Rodrigues De Sousa RUA 240 349, GO Goiania, 74533-260 Brazil; the consignee as REIS DE SOUZA, with an address 24 N. Main Street, Natick, Massachusetts 01760; and the contents as “vitamins.”

10. This package is just one of over 140 packages seized by CBP since November 13, 2021, that were sent from Brazil to Framingham, Massachusetts and the surrounding towns and have been found to contain illegally imported pharmaceutical-grade controlled substances. At least twenty-four of those seizures are associated with the REIS DE SOUZA DTO, either because REIS DE SOUZA was the intended recipient or because investigators have determined that REIS DE SOUZA or his associates used emails and phone numbers that are associated with these seized packages.

11. For example, on November 28, 2023, CBP seized a package from Brazil containing what appeared to be illegally imported prescription grade-controlled substances, including, but not limited to phenobarbital, a Schedule IV controlled substance; testosterone; a Schedule III controlled substance; lisdexamfetamine, a Schedule II controlled substance; and methylphenidate, a Schedule II controlled substance. An invoice contained within the package listed another individual as the recipient of the package, but listed the REIS DE SOUZA’s telephone number as the contact phone number.

12. Similarly, on January 5, 2024, CBP seized a package containing, methylphenidate, a Schedule II controlled substance; and lisdexamfetamine, a Schedule II controlled substance. This package had been shipped from Brazil, and destined for Douglas De Souza, 1630 Worcester Road, Apt. [REDACTED], Framingham, MA 01702.

13. Based on the above, I believe the REIS DE SOUZA DTO illegally imports pharmaceutical grade drugs from Brazil into the United States so that they can illegally distribute those drugs.

14. On October 12, 2023, DEA received an anonymous tip through its web portal. The tip stated that:

There is a man (called Douglas Souza Reis) from Brazil, who is selling illegal medicines without prescription to the Brazilian community inside the Green at 9 and 90 condominiums in Framingham ([FULL ADDRESS REDACTED]).<sup>1</sup> Some of these drugs are Zolpidem, Ritalin, Vyvanse, Dipyrone and Ozempic. His phone number is [REDACTED]-1842 and he negotiates via WhatsApp. He only speaks Portuguese, and his Instagram is @reissouzadouglas.

## II. **Controlled Purchases of Pharmaceutical-Grade Controlled Substances from REIS DE SOUZA and DEKNY**

### A. Initial Communications with REIS DE SOUZA

15. On October 27, 2023, I telephonically contacted a confidential source (“CS-1”)<sup>2</sup> working with the DEA. I directed CS-1 to contact and attempt to negotiate the purchase of

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<sup>1</sup> The full address and complete telephone number were included in the anonymous tip, but I am redacting this information in the interest of the Defendant’s privacy. I understand that The Green at 9 and 90 is the trade name of an apartment complex that is comprised of several buildings located at 1610-1640 Worcester Road, Framingham, MA 01702. The Green at 9 and 90’s website describes this complex as a “luxury apartment community.” Records obtained from The Green at 9 and 90 confirm that REIS DE SOUZA is the lessee of an apartment at that location. I am aware of the full address at which he has resided based on my review of records produced by The Green at 9 and 90 and based on my own observations during the investigation.

<sup>2</sup> CS-1’s Massachusetts criminal history check (BOP) reveals: (1) In 2004, a civil restraining order was issued against CS-1. This restraining order expired in 2005 and was closed; (2) In 2018, a civil restraining order was issued against CS-1. This restraining order expired in 2019 and was closed; (3) There is at least one sealed case on file for CS-1, according to CS-1’s Massachusetts criminal history check (BOP). CS-1’s NCIC criminal history reveals one entry; (4) CS-1 was arrested on a warrant by Easton Police department in May 2003 for “Intimidate/Interfere/Influence” of a witness. CS-1 has been working with the DEA as a CS since approximately 2018. To date, CS-1’s cooperation has contributed to a total of four federal/State indictments. I believe that the information that CS-1 has provided is reliable. CS-1 no longer

pharmaceutical grade narcotics from REIS DE SOUZA, who was using the same telephone number identified in the anonymous tip (the “1842 Number.”)

16. Records obtained from AT&T for the 1842 Number confirm that this phone number was activated on November 5, 2022, and was subscribed to Douglas REIS DE SOUZA of Framingham, Massachusetts.

17. During the month of November 2023, at investigators’ direction, CS-1 communicated on multiple occasions regarding the purchasing of pharmaceutical grade narcotics with REIS DE SOUZA, who was using the 1842 Number. Investigators recorded and preserved all WhatsApp text message communications between CS-1 and REIS DE SOUZA.

18. On November 13, 2023, at investigators’ direction, CS-1 used WhatsApp to communicate with REIS DE SOUZA, who was using phone number the 1842 Number.<sup>3</sup> During this initial exchange, REIS DE SOUZA agreed to sell CS-1 one injectable pain medicine cocktail for \$100.00. At no time did REIS DE SOUZA inquire about CS-1’s health, medical history, ailments, medications CS-1 is currently taking, or allergies to any medications. Nor has REIS DE SOUZA asked CS-1 if he/she is currently taking prescriptions, a prescription history, or if CS-1 is in the care of a licensed doctor.

19. On or about November 15, 2023, REIS DE SOUZA told CS-1 to contact him on WhatsApp using the 1842 Number. REIS DE SOUZA then texted CS-1, using WhatsApp, his

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works as a confidential source for the DEA however, he/she works with other federal law enforcement agencies as a confidential source.

<sup>3</sup> All WhatsApp text message communications between CS-1 and REIS DE SOUZA referenced in this Affidavit have been recorded and preserved.

electronic business card. The electronic business card contained the following text, which has been translated from Portuguese:

Douglas Reis, Pharmacist  
**[REDACTED-1842]**  
 Remedies from Brazil  
 Service 24 H  
 Call me on Whats[App] and I can help you  
 Don't miss your work day  
 Pharmacist with over 22 years of experience  
 Indication of medicines for adult and pediatric use  
 Contraceptive pills and injectables  
 Injectable cocktail to treat muscular and orthopedic problems  
 Perforation of ear cells.

The business card also contained a QR code, which when scanned opens a WhatsApp chat between the user and REIS DE SOUZA. The QR code auto populated a chat requesting medication.

20. Based on investigators' review of publicly available information, REIS DE SOUZA is not, nor has he ever been, a licensed pharmacist in the United States. REIS DE SOUZA has not applied for, nor holds, a DEA registration number as is required to prescribe and provide controlled substances.

B. Controlled Purchase of Pharmaceutical Grade Substances on November 17, 2023

21. In advance of November 17, 2023, REIS DE SOUZA agreed to distribute various quantities of controlled substances to CS-1. On November 17, 2023 at approximately 11:15 a.m., I and other investigators met with CS-1 at a predetermined meeting location. Investigators searched CS-1 and his/her car for U.S. currency and contraband and found none. Investigators then provided CS-1 with \$200.00: \$120 to purchase quantities of controlled substances; and \$80 to pay off a prior debt.<sup>4</sup>

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<sup>4</sup> The prior debt was from a previous controlled purchase completed at investigators' direction.

22. At approximately 11:45 a.m., at the direction of investigators, CS-1 communicated on WhatsApp with REIS DE SOUZA, who was using the 1842 Number. REIS DE SOUZA instructed CS-1 to meet REIS DE SOUZA at 1630 Worcester Road, Framingham, Massachusetts in 30 minutes.

23. Investigators surveilled CS-1 as CS-1 traveled to 1630 Worcester Road, where CS-1 arrived at approximately 12:23 p.m. Upon arrival, CS-1 observed REIS DE SOUZA and another Hispanic male (later identified as Dionatas FELICIDADE DA SILVA) in the parking lot of this location. CS-1 called to REIS DE SOUZA to get his attention and REIS DE SOUZA instructed CS-1 to wait in the parking lot. Both REIS DE SOUZA and FELICIDADE DA SILVA entered 1630 Worcester Road for a few minutes. Investigators observed REIS DE SOUZA then emerge from this location and approach CS-1's car. REIS DE SOUZA provided CS-1 with a small plastic bag. Investigators surveilled CS-1 drive back to a predetermined meeting location, maintaining constant surveillance. CS-1 provided investigators with the plastic bag, which contained a box of 30 pills, each containing 60mg of codeine, a Schedule II controlled substance; and a box of ten pills, each containing 100mg of tramadol, a Schedule IV controlled substance.<sup>5</sup> The words written on the side of the boxes were all written in Portuguese as per the photo below.

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<sup>5</sup> Subsequent laboratory analysis confirmed the presence of the listed substances.





C. Additional Controlled Purchases Involving REIS DE SOUZA

24. CS-1 made several additional in-person controlled purchases from REIS DE SOUZA during the course of the investigation. These controlled purchases were made in the same manner as the November 17, 2023 controlled purchase discussed above. These purchases are detailed below:

Date Obtained	Drug Type	Tablets	Controlled Substance Schedule
12/7/2023	Codeine	60	Schedule II
12/7/2023	Tramadol	20	Schedule IV
1/11/2024	Clonazepam	60	Schedule IV
1/29/2024	Morphine	300	Schedule II
5/2/2024	Morphine	100	Schedule II
5/2/2024	Codeine	24	Schedule II
5/2/2024	Clonazepam	30	Schedule IV

25. The transactions described in the above paragraphs and included in the chart above, were controlled substance purchases negotiated with, and delivered personally by REIS DE SOUZA. In addition to these transactions, there were a number of additional controlled transactions which CS-1 negotiated with REIS DE SOUZA but where REIS DE SOUZA then sent another member of the DTO—including the Defendants as described below—to deliver the substances. As such, I believe the Defendants work together to distributed controlled substances.

D. Controlled Purchases Involving DEKNY

i. DEKNY Delivered Controlled Substances on March 18, 2024 on Behalf of REIS DE SOUZA

26. In March, 2024, I instructed CS-1 to negotiate the purchase of pharmaceutical grade controlled substances from REIS DE SOUZA. CS-1 engaged in a series of WhatsApp communications, which have been preserved, in which REIS DE SOUZA agreed to sell a quantity of pills containing morphine, a Schedule II controlled substance; and clonazepam, a Schedule IV controlled substance to CS-1.

27. On March 18, 2024 at approximately 10:48 a.m., investigators established surveillance at 1630 Worcester Road, Framingham, Massachusetts.

28. At approximately 12:18 p.m., investigators observed REIS DE SOUZA depart 1630 Worcester Road and drive to an adjacent building in The Green at 9 and 90, located at 1610 Worcester Road, Framingham, Massachusetts.

29. At approximately, 12:30 p.m., investigators met with CS-1 at a predetermined meeting location. Investigators searched CS-1 for U.S. currency and contraband with negative results. Investigators provided CS-1 with \$350.00 in official agency funds. They also equipped CS-1 with audio/video recording equipment. They then followed CS-1 to 1630 Worcester Road.

30. Upon arrival, CS-1 called REIS DE SOUZA. REIS DE SOUZA told CS-1 that REIS DE SOUZA's cousin would meet CS-1 to complete the planned transaction.

31. At approximately 1:27 p.m., investigators observed CS-1 enter the parking lot for 1630 Worcester Road. Investigators then observed a male, later identified as DEKNY, exit 1630 Worcester Road, provide a paper bag to the CS-1 through the driver's side window of CS-1's car, and re-enter 1630 Worcester Road.

32. At approximately 1:29 p.m., investigators observed CS-1's car depart 1630 Worcester Road and followed it until CS-1 arrived at the predetermined meeting location. Upon arrival at the pre-determined meeting location, CS-1 transferred four sealed blister packs of clonazepam pills and one sealed box containing approximately fifty morphine pills to investigators.<sup>6</sup>

33. Based on the above, I believe DEKNY delivered the clonazepam and morphine pills on behalf of REIS DE SOUZA.

ii. DEKNY's Role in January 29, 2024 Controlled Purchase

34. In addition to directly distributing controlled substances on REIS DE SOUZA's behalf, DEKNY also generally helped the REIS DE SOUZA DTO achieve its criminal goals.

35. For example, as described in the table above, CS-1 acquired 300 pills containing morphine from REIS DE SOUZA on January 29, 2024. Prior to January 29, 2024, CS-1 contacted REIS DE SOUZA on WhatsApp to negotiate this transaction.

36. Prior to this transaction, at approximately 2:10 p.m., CS-1 met with investigators at a predetermined meeting location. Investigators searched CS-1 and CS-1's car for U.S. currency

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<sup>6</sup> Subsequent laboratory analysis confirmed the presence of both substances.

and contraband and found none. Investigators then provided CS-1 with \$375.00 of official agency funds to purchase six boxes of morphine pills containing 50 pills each.

37. At approximately 2:28 p.m., investigators outfitted CS-1 with audio/video recording equipment. Investigators then followed CS-1 as he/she drove to 1630 Worcester Road, Framingham, Massachusetts. Investigators observed CS-1 arrive at this location at approximately 2:41 p.m. At this time, investigators observed REIS DE SOUZA exit the stairwell of 1630 Worcester Road in the company of another individual later identified as DEKNY. DEKNY then stood at the doorway to 1630 Worcester Road, while REIS DE SOUZA completed the transaction. Based on investigators' observations in concert with their training and experience, investigators believed that DEKNY was acting as a lookout for REIS DE SOUZA.

38. At approximately 2:43 p.m., I observed REIS DE SOUZA standing at the passenger's side window of CS-1's vehicle. At approximately 2:47 p.m., investigators observed REIS DE SOUZA walk away from CS-1's car and then walk back inside 1630 Worcester Road with DEKNY.

39. At approximately 2:48 p.m., CS-1 departed, at which time investigators maintained constant observation of CS-1's vehicle until it arrived back to a pre-determined location. Upon arrival at the pre-determined location, CS-1 provided me with a paper bag that contained six sealed boxes of pharmaceutical grade pills containing morphine,<sup>7</sup> a Schedule II controlled substance. The words written on the side of the boxes were all written in Portuguese.

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<sup>7</sup> Subsequent laboratory analysis confirmed the presence of morphine.

40. Based on the above, I believe REIS DE SOUZA distributed the morphine to CS-1 and that DEKNY helped REIS DE SOUZA by serving as a lookout during the transaction to protect REIS DE SOUZA from being detected by law enforcement.

41. Based on all of the above, I believe DEKNY works with REIS DE SOUZA to commit the Target Offense.

### **III. Packages Received from REIS DE SOUZA**

42. In addition to making in-person sales of controlled substances, REIS DE SOUZA also mailed packages containing controlled substances to customers. Beginning in May 2024, at investigators' direction, CS-1 (through preserved WhatsApp messages) began requesting that REIS DE SOUZA ship controlled substances to an undercover post office box, which investigators controlled (the "UC Mailbox"), rather than deliver them in person.

43. For example, in May 2024, at the direction of investigators, CS-1, using WhatsApp negotiated the purchase of codeine, tramadol, and clonazepam pills from REIS DE SOUZA, who was using the 1842 Number. In these messages, CS-1 requested that REIS DE SOUZA mail these controlled substances to the UC Mailbox in West Palm Beach, Florida.

44. On May 29, 2024, REIS DE SOUZA sent a WhatsApp message to CS-1, advising him/her that he had shipped a package with USPS tracking number 9505 5121 1967 4150 1725 73 containing the requested controlled substances. On June 3, 2024, investigators retrieved the package from the UC Mailbox. The package listed the sender as "Douglas Reis, 1630 Worcester Road, Apt. [REDACTED], Framingham, Massachusetts 01702."

45. Investigators in Florida then shipped the package to investigators in Boston, Massachusetts, who opened the package and recovered three blister packs of pills containing codeine, a Schedule II controlled substance; one blister pack of pills containing tramadol, a

Schedule IV controlled substance; and one blister pack of pills containing clonazepam, a Schedule IV controlled substance.<sup>8</sup>

46. Based on the above, I believe REIS DE SOUZA distributed the above controlled substances through the mail to CS-1. As detailed below, I believe other members of the REIS DE SOUZA DTO also mailed packages containing controlled substances (via the UC Mailbox) all on behalf of REIS DE SOUZA.

47. Between June 20 and December 5, 2024 members of the REIS DE SOUZA DTO mailed the following packages to the UC Mailbox containing the following controlled substances:

Date Obtained	Drug Type	Tablets	Controlled Substance Schedule	Shipper/Method of Payment
6/5/2024	Codeine	30	Schedule II	DEKNY paid cash
6/5/2024	Tramadol	10	Schedule IV	DEKNY paid cash
6/5/2024	Clonazepam	30	Schedule IV	DEKNY paid cash
7/1/2024	Codeine	10	Schedule II	FNU LNU paid cash
7/1/2024	Tramadol	20	Schedule IV	FNU LNU paid cash
7/1/2024	Clonazepam	30	Schedule IV	FNU LNU paid cash
10/2/2024	Clonazepam	30	Schedule IV	DEKNY paid cash
11/12/2024	Clonazepam	30	Schedule IV	DEKNY paid via debit card
12/10/2024	Clonazepam	30	Schedule IV	REIS DE SOUZA paid with debit card

48. For all of the above transactions, investigator directed CS-1 or another CS (“CS-2”)<sup>9</sup> to communicate directly with REIS DE SOUZA to order the controlled substances. Then,

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<sup>8</sup> Subsequent laboratory testing confirmed the presence of all three controlled substances.

<sup>9</sup> CS-2’s criminal history check reveals one arrest in 2013 by Homeland Security Investigations (HSI) for which the charge listed is “Deportable Alien.” In 2024, CS-2 was granted United States Citizenship. CS-2 has been working with the Food and Drug Administration (FDA) as a CS since approximately 2010. To date, CS-2’s cooperation has contributed to approximately 50 investigations and 20 arrests. I believe that CS-2 is reliable.

based on records obtained from USPS (including surveillance video from USPS locations), investigators determined that other members of the DTO, including DEKNY were the ones who physically shipped the package to the UC mailbox, as noted in the chart above. Based on all of the above, I believe REIS DE SOUZA, DEKNY, and a third unknown individual were involved in shipping controlled substances on behalf of the DTO.

#### **IV. Criminal Conduct of DEKMARA and GUIMARAES**

49. On February 5, 2025, this Court authorized investigators to search a mobile phone belonging to FELICIDADE DA SILVA. The search revealed that REIS DE SOUZA has directed FELICIDADE DA SILVA, GUIMARAES, and DEKMARA to distribute controlled substances on his behalf. In particular, investigators identified a group WhatsApp chat on FELICIDADE DA SILVA's telephone entitled "Droga Reis Delivery."<sup>10</sup> In this chat, a phone number was associated with a contact for GUIMARAES and a second phone number was associated with a contact for DEKMARA, as explained below.

##### **A. Identification of DEKMARA**

50. Based on investigators' review of FELICIDADE DA SILVA's phone, I understand that the phone number associated with the contact entitled "Dekmara" is \*\*\*-\*\*\*-6470 (the "6470 Number"). According to records obtained from the wireless carrier for this phone, this phone is subscribed to Carlos Eduardo Almeida Faria. Based on my review of DEKMARA's visa application that she submitted to the Department of State, I understand that Almeida Faria is DEKMARA's husband. In addition, investigators have identified a Facebook account belonging to "DEKMARA REIS." A photograph that is posted to this Facebook profile is identical to a

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<sup>10</sup> I understand that "Reis" is both the first part of REIS DE SOUZA's surname and the Portuguese word for "king." "Droga" is the Portuguese word for "drug."



photograph that is associated with DEKMARA in the Droga Reis Delivery WhatsApp group chat. These photographs show the same individual who appears on DEKMARA's visa application.

51. Based on the above, I believe DEKMARA is the individual using the 6470 Number in the Droga Reis WhatsApp group chat.

B. Identification of GUIMARAES

52. Based on investigators' review of FELICIDADE DA SILVA's phone, the phone number associated with the contact entitled "Cleide" is \*\*\*-\*\*\*-5180. According to records obtained from the wireless carrier for this phone, I understand that this phone is subscribed to GUIMARAES.

53. In addition, there is other evidence that GUIMARAES is associated with other co-conspirators. According to records obtained from Eversource, I understand that DEKNY had included GUIMARAES as a registered user for his Eversource account. In doing so, DEKNY identified GUIMARAES as his sister.

C. DEKMARA's and GUIMARAES's Role in Filling Orders for Controlled Substances on REIS DE SOUZA's Behalf

54. WhatsApp messages recovered from FELICIDADE DA SILVA's phone show that REIS DE SOUZA's drug customers contacted REIS DE SOUZA requesting drugs, including controlled substances. REIS DE SOUZA then provided information about the customer's order to GUIMARAES or DEKMARA, who would prepare the order for delivery. Based on investigators' review of these messages, and the investigation to date, I believe GUIMARAES, DEKMARA, and FELICIDADE DA SILVA all delivered controlled substances to REIS DE SOUZA's drug customers and therefore have all committed the Target Offense.

55. For example, on October 19, 2024, REIS DE SOUZA sent a message to the other members of the Droga Reis Delivery group chat indicating that a drug customer had sent REIS DE

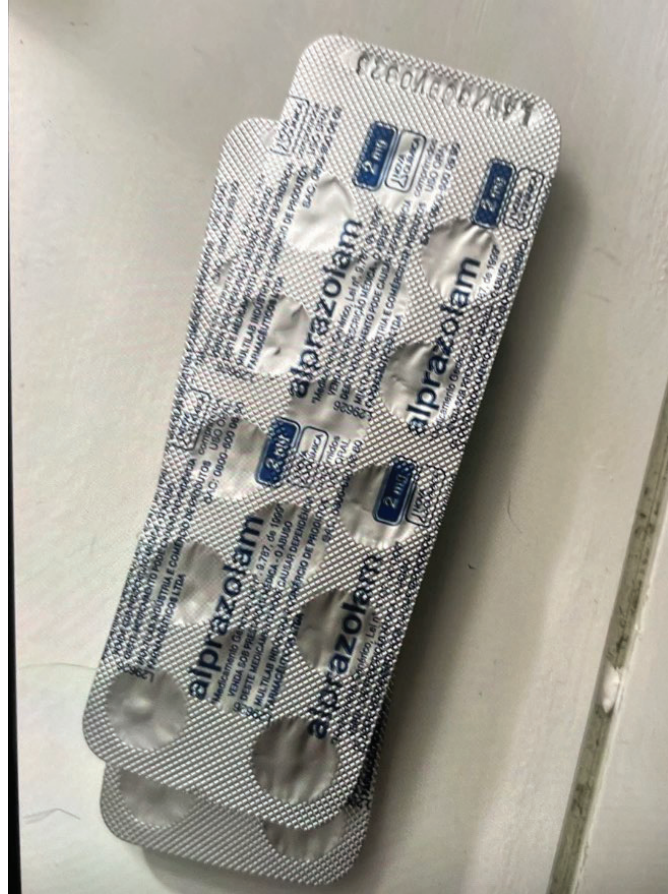


SOUZA a Zelle payment for a quantity of tadalafil, a non-controlled medication that is only available with a doctor's prescription and which is therefore misbranded when dispensed without a prescription. REIS DE SOUZA provided an address for delivery and said that "*this address if a pizzeria.*" FELICIDADE DA SILVA replied to the chat indicating that he had arrived at GUIMARAES's location ("*hurry up, I'm here.*"). GUIMARAES acknowledged ("*ok*"). The next day, FELICIDADE DA SILVA listed for the group the deliveries that he had made on the prior day. This list included the tadalafil described above. Based on the foregoing, I believe that these drugs were delivered.

56. Similarly, on November 30, 2024, REIS DE SOUZA indicated to the other members of the Droga Reis Delivery group chat that a drug customer had sent REIS DE SOUZA a message requesting a quantity of Androgel, a Schedule III controlled substance. REIS DE SOUZA directed his co-conspirators to fill the order via WhatsApp message. GUIMARAES then acknowledged the order ("*Ok*"). FELICIDADE DA SILVA requested that that she complete the order expeditiously so he could deliver the Androgel to the purchaser ("*Hurry up.*"). GUIMARAES then acknowledged FELCIDADE DA SILVA's message ("*Ok*"). Based on the above, I believe GUIMARAES processed, and FELCIDADE DA SILVA delivered, controlled substances on behalf of, and at the direction of, REIS DE SOUZA.

57. Similarly, on January 8, 2025, a drug customer sent REIS DE SOUZA a message requesting a quantity of tramadol, a Schedule IV controlled substance. He further instructed whoever delivered the drugs where to leave them ("*Leave it in the mailbox.*"). FECLIDADE DA SILVA acknowledged the order and instructed DEKMARA to complete the order ("*Hurry up*"). DEKMARA acknowledged the order. FELICIDADE DA SILVA indicated that the order had been "delivered."

58. In addition, on January 27, 2025, a drug customer sent REIS DE SOUZA a message requesting a quantity of alprazolam, a Schedule IV controlled substance. A short time later, REIS DE SOUZA sent the group a voice note indicating that his co-conspirators needed to hurry to fill this order. FELICIDADE DA SILVA responded that he was en route. In response, DEKMARA sent the group a photo of the drugs that she had packaged for distribution:



In response, FELICIDADE DA SILVA said to “hurry up” and indicated that (“*I am available [to collect the alprazolam]*”). REIS DE SOUZA then told the group that this delivery needed to be made “*after 3:00.*” FELICIDADE DA SILVA acknowledged (“*ok*”). The next day, FELICIDADE DA SILVA listed for the group the deliveries that he had made on the prior day. This list included the alprazolam described above. Based on the foregoing, I believe that these drugs were delivered.

59. FELICIDADE DA SILVA's mobile phone contains dozens between of similar exchanges (sent regularly between May 17, 2024 and January 30, 2025) between REIS DE SOUZA, DEKNY, DEKMARA, GUIMARAES, AND FELICIDADE DA SILVA in which DEKMARA and GUIMARAES processed drugs for distribution at REIS DE SOUZA's direction.

60. Based on the foregoing, I believe that DEKMARA and GUIMARAES conspired with REIS DE SOUZA and other members his organization to distribute and possess with the intent to distribute controlled substances.

D. Additional Criminal Conduct by DEKMARA

61. As discussed above, investigators have identified the apartment building located at 1630 Worcester Road as a location utilized by the DTO in furtherance of the Target Offense. On January 21, 2025, I was conducting surveillance outside 1630 Worcester Road and observed a female conduct a series of hand-to-hand drug transactions. Based on my observations as compared with the driver's license photograph for DEKMARA, I believe that the individual I observed was DEKMARA.

## CONCLUSION

62. Based on the information described above, I have probable cause to believe that REIS DE SOUZA, DE CARVALHO REIS, DEKMARA and GUIMARAES have committed the Target Offense.

Respectfully submitted,

Kevin Mello  
Kevin Mello  
Special Agent  
Drug Enforcement Administration

Sworn to via telephone in accordance with Federal Rule of Criminal Procedure 4.1 on March 5, 2025.

  
DONALD L. CABELL  
CHIEF UNITED STATES MAGISTRATE JUDGE

